UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)
NUTTER, McCLENNEN & FISH, LLP,)
DI : (:cc	
Plaintiff,	
v.) C.A. No. <u>13-cv-12366-FDS</u>
)
RED LAMBDA, INC., and BAHRAM YUSEFZADEH,	[Filed in redacted form pursuant to the Court's Sept. 5, 2013 Order]
Defendants.)

VERIFIED COMPLAINT

1. Plaintiff seeks to recover sums owed for legal services and to enforce a written contract under which defendant Red Lambda, Inc. was obligated to pay for those services. Plaintiff also seeks to recover from defendants Red Lambda, Inc. and Bahram Yusefzadeh for fraudulent misrepresentations and for unfair or deceptive acts or practices by those defendants in violation of M.G.L. c. 93A.

Jurisdiction and Venue

- 2. This is an action between citizens of different states in which the amount in controversy, without interest and costs, exceeds the sum or value specified in 28 U.S.C. § 1332.
- 3. Venue in this District is proper pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events that gave rise to the claims alleged herein occurred in this District, as alleged with more particularity hereinbelow.

Parties

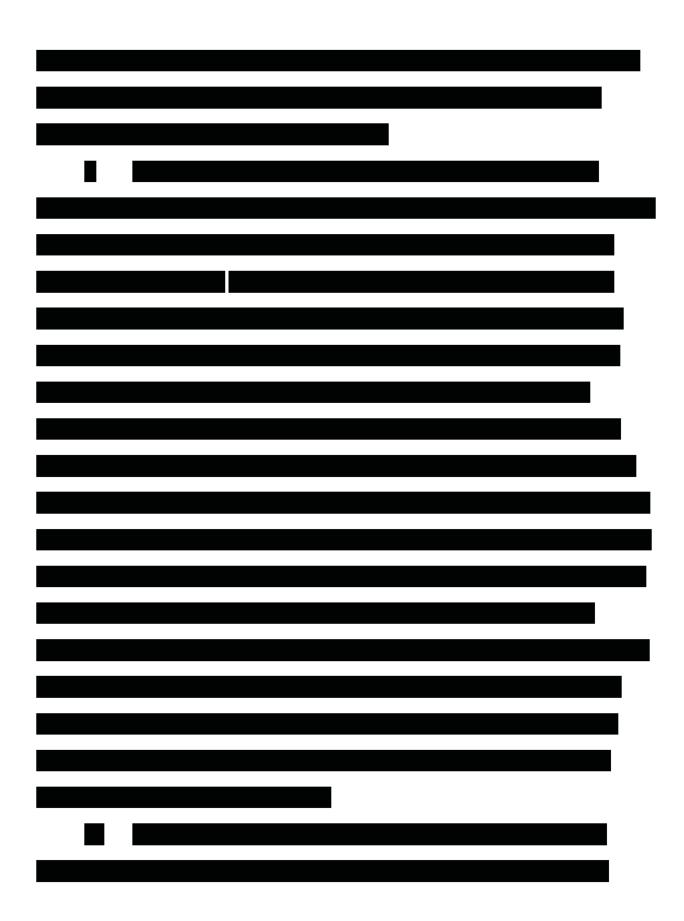
4. Plaintiff Nutter, McClennen & Fish, LLP ("Nutter") is a Massachusetts limited liability partnership engaged in the practice of law with a principal place of business at 155

Seaport Blvd., Boston, Massachusetts.

- 5. Defendant Red Lambda, Inc. ("Red Lambda") is a Florida corporation with a principal place of business at 2180 West State Road 434, Suite 6200, Longwood, Florida.
- 6. Defendant Bahram Yusefzadeh is a citizen of Florida. At all times material hereto, Yusefzadeh has served as the chief executive officer of Red Lambda.

Facts and Claims





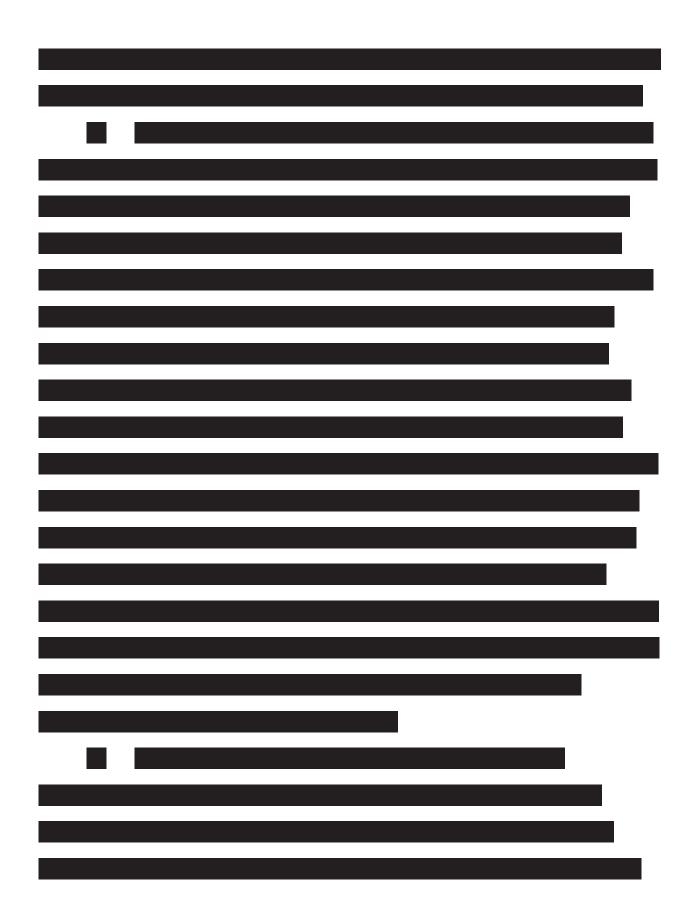
COUNT ONE (Breach of Contract)



COUNT TWO

(Against Defendants Yusefzadeh and Red Lambda for Fraudulent Misrepresentations)







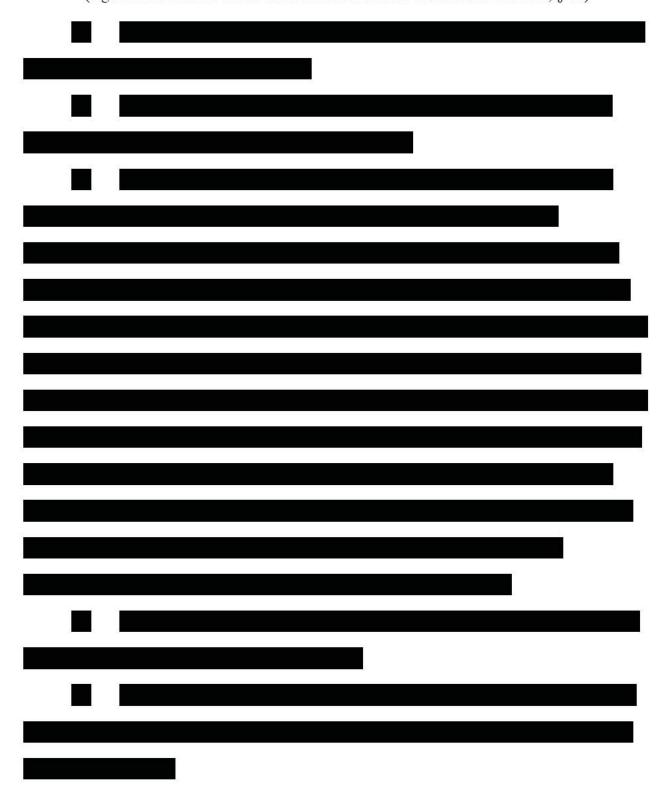


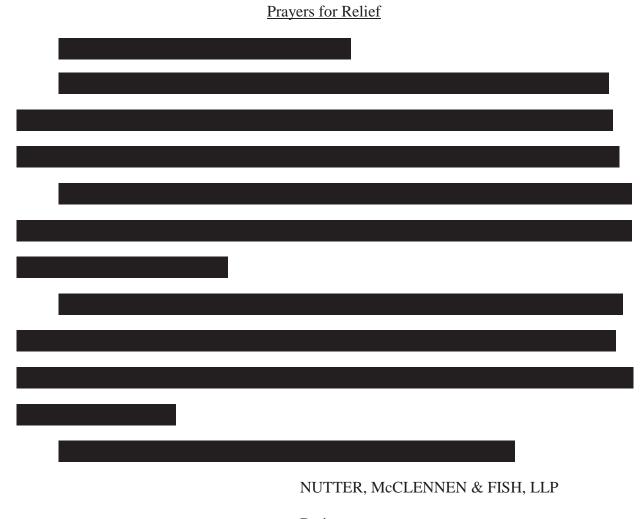




COUNT THREE

(Against Defendants Yusefzadeh and Red Lambda under M.G.L. c. 93A, § 11)





By its attorneys,

/s/ Michael A. Walsh

Michael A. Walsh (BBO #514875)

mwalsh@nutter.com

Nutter McClennen & Fish, LLP
155 Seaport Blvd.

Boston, MA 02210
617-439-2000

Date: September 23, 2013